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May 28, 2021

**VIA ECF**

Honorable Michael A. Hammer  
United States District Court for the  
District of New Jersey  
Martin Luther King Courthouse  
50 Walnut Street Room 2C  
Newark, NJ 07101



**Re: *United States v. Matthew Goetsche, et al., 19-CR-877 (CCC)*  
Proposed Addition of Third-Party Custodian**

Dear Judge Hammer:

Please accept this letter in lieu of a more formal motion on behalf of Defendant Matthew Goetsche. We respectfully move to add Sandra Anne Crain, Mr. Goetsche's mother-in-law, as an additional third-party custodian. On December 11, 2020, the Court ordered Mr. Goetsche released on bail conditions, including the pretrial release condition that he shall be released to the custody of third-party custodians Danielle Goetsche or Victoria Landerman. *See Order Setting Conditions of Release* (dkt. 171).

U.S. Pretrial Services Officer David Hernandez has approved Ms. Crain as a suitable third-party custodian. I have reviewed each of the terms of the bail conditions with Ms. Crain. She understands and accepts her responsibilities as a third-party custodian. The U.S. Attorney's Office takes no position on our letter motion and defers to Pretrial Services.

Thank you in advance.

Respectfully submitted,

Rodney Villazor, Esq.  
SMITH VILLAZOR LLP

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I agree to (a) supervise Mr. Goetsche in accordance with all conditions of release, (b) to use every effort to assure the appearance of Mr. Goetsche at all scheduled court proceedings, and (c) to notify the court immediately in the event Mr. Goetsche violates any conditions of release or disappears.

Sandra Anne Crain  
Sandra Anne Crain

cc: Andrew Lourie, Esq.  
Benjamin Sauter, Esq.  
Amanda Tuminelli, Esq.  
Government counsel of record (via ECF and e-mail)  
U.S. Pretrial Services Officer David Hernandez (via e-mail)  
U.S. Pretrial Services Officer Troy Ruplinger (via e-mail)

SO ORDERED  
6/2/2021  
s/Michael A. Hammer  
Hon. Michael A. Hammer